

EXHIBIT A

From: Daniel O'connell [<mailto:doconnell@ocpllaw.com>]

Sent: Tuesday, September 17, 2013 12:47 PM

To: Karina Schrengohst; Amy Royal

Cc: owenshea@aol.com

Subject: FW: Koss v Palmer Water,

Counsel,... In light of Judge Neimans rulings yesterday, and relating to our Motion To Compel, Attorney Shea and I will be continuing the depositions of Henry Rigali and William Cole for one week until Thursday September 26 2013 both scheduled for the same time frame Of 9 and 12 at Catugno Court Reporting. Should this date not be available...then be advised, we will seek to further move attorney Sheas deposition consistent with scheduling of Mr Rigali and Cole. We further request in accordance with the courts order "all Documents between Henry Rigali and/or the Board and/or The Royal LLP and /or Rigali the Board AND The Royal LLP since September 2011(consistent with the Plaintiffs sworn testimony of her first complaint to the board of sexual harassment) to the present. We further request All documents listed in your "partial" Privilege log. Be further advised that we will be requesting to take the depositions of Attorney Schrengohst and Attorney Royal and we request that you provide us with available dates for same.